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and numerous Wildfire Claimants

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

<i>In re:</i>	)	Case No. 19-30088-DM
PG&E CORPORATION	)	(Lead Case)
-and-	)	(Jointly Administered)
PACIFIC GAS AND ELECTRIC COMPANY	)	<b>KAREN AND RICHARD GOWINS'</b>
Debtors.	)	<b>REPLY IN SUPPORT OF ABRAMS'</b>
	)	<b>MOTION FOR ORDER DEEMING</b>
	)	<b>SUPPLEMENTS TO CLAIMS TIMELY</b>
<input type="checkbox"/> Affects PG&E Corporation	)	Judge: Honorable Dennis Montali
<input type="checkbox"/> Affects Pacific Gas & Electric	)	Date: March 22, 2023
<input checked="" type="checkbox"/> Affects Both Debtors	)	Time: 10:00 A.M.
	)	Place: Via Video/Teleconference or refer to:
	)	<a href="http://www.canb.uscourts.gov/calendars">www.canb.uscourts.gov/calendars</a>
	)	
	)	U.S. Bankruptcy Court
	)	Courtroom 17
	)	450 Golden Gate Avenue
	)	16 <sup>th</sup> Floor
	)	San Francisco, CA 94102

Karen Gowins, a victim of the Camp Fire and represented by her counsel, Bonnie E. Kane  
and Steven S. Kane, join in the Reply of William Abrams to the opposition by Debtor to his  
Motion for Leave to File a Supplemental Claim.

The most cogent fact in support of Mr. Williams Motion is that the Court has previously  
granted a nearly identical motion by Baupost requesting the same relief. The Debtor has  
presented opposition consisting of irrelevancies and distractions, but has cited no facts or law to

1 justify unequal treatment of Mr. Abrams. It is difficult to imagine that Baupost would enjoy a  
2 remedy denied to tens of thousands of fire victims.

3 This is particularly true for the simple reason that Baupost, a very sophisticated investor  
4 was able to freely investigate regarding the value of PG&E stock. The Fire Victims, on the other  
5 hand, were tens of thousands of displaced persons struggling to survive, who were forced to  
6 accept stock as part of their compensation from the Bankruptcy.

7  
8 Even more importantly, the most detailed history of PG&E's "run-to-failure" policy did  
9 not come to light until after the deadline for the Fire Victims to vote on the plan. The deadline to  
10 vote was May 15, 2020. It was not until June 16, 2020, that The Camp Fire Public Report: A  
11 Summary of the Camp Fire Investigation, Butte County District Attorney was issued. This report  
12 is by far the most comprehensive in detailing PG&E's misleading actions and non-disclosure with  
13 regard to safety. And, it was not until the same date, June 16, 2020, that PG&E pled to 84  
14 individual counts of involuntary manslaughter in a sealed case. How could the Fire Victims know  
15 that the value of the securities was overinflated in the first place and would fall as the Debtors'  
16 undisclosed and grossly deficient safety practices came to light? There was ample expert  
17 testimony in the damages case referred by this Court that the value of the shares at the time of the  
18 vote was 2.1 billion dollars short of the 6.75 billion promised in the Restructuring Support  
19 Agreement and the Plan. Even beyond that issue, PG&E's behavior of non-disclosure of risks  
20 and abhorrent safety practices it engaged in to maximize dividends, executive bonuses and  
21 campaign contributions led to lower stock prices than a similar company emerging from  
22 bankruptcy.  
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1 We request that the Court not deny to the Fire Victims the remedy enjoyed by Baupost.  
2 Granting the Abrams' motion will provide a potential opportunity for the Fire Victims to receive  
3 enhanced compensation for the losses in the fires, entirely consistent with the Bankruptcy Code  
4 and cases interpreting it.

5 Dated: March 15, 2023

Respectfully submitted,

7 THE KANE LAW FIRM

8  
9 By: /s/ Steven S. Kane  
STEVEN S. KANE